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REMARKS

Upon entry of this Response, claims 1-3, 5-10, 12-18, and 20-23 remain pending in the present patent application. Claims 1, 5, 7, 9, 12, 14, 16, 20, and 22 have been amended herein. Applicants respectfully request reconsideration of the pending claims in view of the following remarks.

In item 6 of the Office Action, claims 1, 6, 9, 13, 16, and 21 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent 6,446,204 issued to Pang et al. (hereafter "Pang"). Anticipation under §102 "requires the disclosure in a single prior art reference of each element of the claim under construction. W.L. Gore & Associates, Inc. v. Garlock, Inc., 220 U.S.P.Q. 303, 313 (Fed. Cir. 1983). For the reasons that follow Applicant asserts that the rejection of claims 1, 6, 9, 13, 16, and 21 as being anticipated by Pang is improper. Accordingly, Applicant requests that the rejection of these claims be withdrawn.

To begin, claim 1 as previously amended recites as follows:

1. (Currently Amended) A system for authentication, comprising:

a processor circuit having a processor and a memory; an authentication system stored in the memory and executable by the processor, the authentication system comprising:

a plurality of authentication agents, each of the authentication agents authenticating at least one user parameter by performing at least one authentication task; and

an authentication manager that requests each of the authentication agents to authenticate an unauthenticated user parameter until all of the authentication agents have been requested to authenticate the unauthenticated user parameter and the authenticated user parameter is authenticated by at least one of the authentication agents, unless one of the authentication agents fails to authenticate the unauthenticated user parameter; and

wherein the unauthenticated user parameter that all of the authentication agents are requested to authenticate is identical for each of the authentication agents.

As set forth in claim 1 as amended above, the unauthenticated user parameter that all of the authentication agents are requested to authenticate is identical for each of the authentication agents.

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In contrast, *Pang* describes in the process of FIGS. 7A and 7B the authentication of individual user parameters by sending specific parameters to specific authentication agents that are configured to authenticate those given parameters. In other words, a different authentication parameter is supplied to respective ones of the authentication agents ("Providers") of *Pang*. In one cited example, the provider 606 receives the name of a given individual as an authentication parameter to authenticate, and the provider 608 is given an IP address to authenticate. It is not the case, for example, that the IP address is given to both the providers 606 and 608. Initially, the different authentication parameters are contained in the same authentication request. The different authentication parameters are separately applied to different providers. In this respect, each provider does not authenticate the same authentication parameter.

Claim 1 as amended specifies that all of the authentication agents are requested to authenticate the same unauthenticated user parameter. This is the case even if the authentication agents may be configured to authenticate parameters of a different type than the unauthenticated user parameter, where some of the authentication agents do not operate to authenticate various types of authentication parameters that they may be requested to authenticate.

This fact facilitates the extensibility of the design of the authentication system according to the present invention. In particular, authentication agents can receive a request to authenticate a user parameter that they are not configured to authenticate. In such situations, the authentication agents simply transmit a "valid" reply back to the authentication manager and the authentication manager will not know that the authentication agent was not actually configured to authenticate the type of parameter it was asked to do. In this respect, authentication agents may more easily be added to the authentication system without worrying about trying to map given types of authentication parameters to be sent to specific ones of the authentication agents for authentication.

Thus, the Providers of *Pang* are statically linked to the authentication manager software of *Pang* in order to route the proper types of authentication parameters to the corresponding ones of the authentication agents. In contrast, to add new types of user parameters for authentication according to the claimed embodiments of the present

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invention, agents may simply be added to the system without regard for trying to map static links between the agents and the manager.

Therefore, Applicants assert that *Pang* fails to show or suggest each of the elements of claim 1 as amended. Also, Applicants assert that *Pang* fails to show or suggest each of the elements of claims 9 and 16 to the extent that these claims have been amended for the reasons discussed above with respect to claim 1. Accordingly, Applicants request that the rejection of claims 1, 9, and 16 be withdrawn. In addition, Applicants request that the rejection of claims 6, 13, and 21 be withdrawn as depending from claims 1, 9, or 16, respectively.

Next, in item 7 of the Office Action, claims 2, 7-8, 14-15, 17, and 22-23 have been rejected under 35 U.S.C. §103(a) as being unpatentable over *Pang.* A prima facie case of obviousness is established only when the prior art teaches or suggests all of the elements of the claims. MPEP §2143.03, In re Rijckaert, 9 F.3d 1531, 28 U.S.P.Q.2d 1955, 1956 (Fed. Cir. 1993). Claims 7, 14, and 22 have been amended herein to incorporate subject matter similar in scope with claim 1 as amended. Accordingly, Applicant requests that the rejection of claims 7, 14, and 22 be withdrawn for the same reasons discussed with respect to claim 1. In addition, Applicant requests that the rejection of claims 2, 8, 15, 17, and 23 be withdrawn as depending from claims 1, 7, 14, and 22.

In item 8 of the Office Action, claims 4-5, 11-12, and 19-20 have been rejected under 35 U.S.C. §103(a) as being unpatentable over *Pang*, and further in view of U.S. Patent 6,615,264 issued to Stoltz et al. (hereafter "*Stoltz*"). A prima facie case of obviousness is established only when the prior art teaches or suggests all of the elements of the claims. MPEP §2143.03, In re Riickaert, 9 F.3d 1531, 28 U.S.P.Q.2d 1955, 1956 (Fed. Cir. 1993). Claims 4, 11, and 19 were canceled in the previous Response, thereby rendering this rejection moot with respect to such claims. Claims 5, 12, and 20 have been amended herein to incorporate subject matter similar in scope with claim 1 as amended. Accordingly, Applicant requests that the rejection of claims 5, 12, and 20 be withdrawn for the same reasons discussed with respect to claim 1.

In addition, in item 9 of the Office Action, claims 3, 10, and 18 have been rejected under 35 U.S.C. §103(a) as being unpatentable over *Pang* as applied to claims 1, 9,

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and 16, and further in view of U.S. Patent Publication 2002/0069247 filed by Paknad et al. (hereafter "Paknad"). A prima facie case of obviousness is established only when the prior art teaches or suggests all of the elements of the claims. MPEP §2143.03, In re Riickaert, 9 F.3d 1531, 28 U.S.P.Q.2d 1955, 1956 (Fed. Cir. 1993). Applicants note that claims 3, 10, and 18 depend from claims 1, 9, and 16 amended herein. Accordingly, Applicants assert that the cited combination of references fail to show or suggest each of the elements of claims 3, 10, and 18 as depending from claims 1, 9, and 16 for the reasons described above. Accordingly, Applicants request that the rejection of claims 3, 10, and 18 be withdrawn.

CONCLUSION

Applicant respectfully requests that all outstanding objections and rejections be withdrawn and that this application and all presently pending claims be allowed to issue. If the Examiner has any questions or comments regarding this response, the Examiner is encouraged to telephone the undersigned counsel of Applicants.

Respectfully submitted,

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